

FYR Team Meeting

Meeting Summary

February 7, 2017

Attendees:

S. Surovchak, DOE-LM	J. Murl, DOE-LM	V. Moritz, EPA	P. Smith, EPA
Carl Spreng, CDPHE	L. Masters, CDPHE	L. Kaiser, Navarro	P. Gallo, Navarro
J. Boylan, Navarro	G. Squibb, Navarro	L. Cummins, Navarro	
M. McDonald, Navarro			

Agenda and Notes:

1) Results of chemical risk review (L. Cummins)

- Comment was made that we do not want to introduce a new exposure scenario (industrial soil RSLs) that wasn't evaluated in 2006 and is not the scenario the RAOs are based on (i.e., WRW). After discussion, it was determined that the methodology for the FYR screen is appropriate, however, it was suggested that the report clarify why it is appropriate to use the industrial soil RSLs in the screening (i.e., the exposure parameters are similar or even slightly more conservative than WRW).
- EPA Region 8 toxicologist (Susan Griffin) is currently reviewing the chemical risk sections.
- Subsurface soil discussion should make the same statement as the surface soil discussion in that the Cr+6 risk is within the EPA risk range.
- Replace Cr VI in text with Cr+6.
- Provide additional explanation of the use of 11.5 multiplication factor in the subsurface screen.
- EPA indicated the discussion of chemical risk screen in Question B is too dense – make it simpler.
- Extended discussion on UU/UE confirmation of the POU. Each pathway in the POU will need to be reviewed for changes to toxicity factors to confirm UU/UE is still valid.
 - Surface water pathway can be assessed using existing surface water monitoring data – i.e., if standards are being met at POCs for the COU, then UU/UE is still valid for POU. Since surface water flow is generally west-east, contaminated surface water only exits the COU at the POCs.
 - Surface and subsurface soil data from the 2006 CRA will need to be reviewed against current residential soil RSLs.
 - Groundwater pathway does not need to be assessed since any contaminated groundwater discharges to surface water prior to leaving the COU. Thus,

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contaminated groundwater will be assessed as surface water at the POCs on the edge of the COU.

- 2) Status of radiological risk review (M.McDonald)
 - Stewart Walker, EPA-HQ will most likely review this FYR report.
 - Vera Moritz, EPA indicated that if there are radiological questions concerning the EPA PRG calculator, contact Stewart directly.
 - With regard to OU3, it was suggested that a review of the CAD/ROD might help to determine if this FYR needs to confirm UU/UE at OU3.
 - RESRAD output files not required to be an appendix for this FYR.
 - With regard to the level of detail in the FYR report, it was suggested that a fairly detailed discussion of the impacts of the changes to Pu toxicity factors be provided.
- 3) FYR schedule
 - Is a formal response to EPA-HQ comments required? Is there a specific form to be used?
 - No, a formal response to EPA comments is not required and there is no standard form to be used.
 - EPA-Region 8 will consolidate all EPA comments submitted for the First Draft review in March and April. Thus, DOE will receive one set of EPA comments on the FYR report.
- 4) Assumptions on RAO Status Table re: reportable conditions versus exceeding SW standards.
 - Table 4, *Fourth FYR RAO Status* (from Question B) was discussed.
 - EPA recommends the focus in the report (and Table 4) remain on reportable conditions within this FYR period, rather than highlighting every exceedance of RFLMA standards (i.e., an exceedance of a standard that does not result in a reportable condition triggering RFLMA consultation).
 - It was also suggested that the RAO status table incorporate the status of other remedy components (e.g., when we mention the OLF reportable condition, also mention that the PLF did not have any reportable conditions during the FYR period).
 - It was recommended that the first sentences in the third column that indicate the RAO *was not met* should be deleted, and simply provide the summary of the reportable condition. The first sentences that indicate the RAO *was met* should remain.
 - FYR Status column for Surface Water RAO: EPA suggested that the column should contain language that more directly answers why the remedy remains protective. EPA recommended the following points be presented in order to provide the status of the reportable condition for uranium at WALPOC: (1) acknowledge the 12-month rolling average exceeded the uranium standard, (2) indicate that this was directly related to an extreme precipitation event, (3) the reportable condition triggered the RFLMA consultative process, (4) the remedy remains protective because the

- exceedance was a short-term event that is not expected to occur with any regularity, and (5) the uranium standard is based on chronic (30-year) exposure.
- 5) RAOs for OLF and PLF, and ICs vs. RAOs in CAD/ROD
 - EPA stated that the only RAOs to be considered in the FYR report are those contained in the CAD/ROD (i.e., soil, groundwater, and surface water RAOs). Preliminary RAOs developed for accelerated actions were consolidated into the final RAOs in the CAD/ROD.
 - 6) Changes to ARARs (input from CDPHE and EPA)
 - CDPHE suggested that the NESHAP standard for radionuclides (10 mrem/year) might be considered a potential ARAR for the site. It was noted that the CAD/ROD concluded that “air emissions present no health or environmental concerns and do not need to be evaluated further” (pg. 50). The 10-mrem standard is mentioned specifically on pages 30 and 49, where it is stated that existing sample data and air modeling indicate the 10-mrem standard would not be approached. CDPHE indicated they would discuss these points with their attorney.
 - 7) Stakeholder input responses
 - Should the four letters from the stakeholders be reproduced in an appendix?
 - It was agreed that the stakeholder letters would not be reproduced in the FYR report. The input would be grouped into similar topics and responses provided for these topics, as has been the practice in previous FYR reports.
 - “Review Period” and “Trigger Action Date” on Five-Year Review Summary Form? The EPA guidance states that these dates come from the EPA database WasteLAN. EPA stated that this database was not applicable to the Rocky Flats Site. EPA indicated that the review period begins with the date when the public notification for the FYR was posted (June 10, 2016) and ends with the date DOE transmits the FYR report to EPA for concurrence (currently scheduled for June 20, 2017). The trigger action date is the date of the approval letter from EPA to DOE for the last FYR report (July 30, 2012).
 - 8) Restrictive Notice. The third FYR report recommended replacement of the Environmental Covenant with a Restrictive Notice and listed this action in the table of “Issues, Recommendations, and Follow-Up Actions.” EPA and DOE agreed that this item would not be carried over as an issue in the fourth FYR report. The rationale is that the Environmental Covenant is currently protective and not currently having a Restrictive Notice in place does not impact protectiveness. It was noted that at this time, issuance of the Restrictive Notice was nearing the point of completion.

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ACTIONS:

- Navarro to provide copy of EPA FYR training to M. McDonald
- Navarro to email fourth FYR report to FYR team on February 15, 2017, for internal review
- Navarro to schedule a follow-up phone call with FYR Team regarding approach to POU UU/UE screen, if necessary
- CDPHE to provide ARAR input from attorney
- CDPHE to provide RESRAD input parameters for dose assessment done in 2006
- CDPHE to research basis for uranium surface water standard (is this strictly human-health based or does it include ecological considerations?)
- EPA to provide ARAR input from attorney